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UNDER
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NOV 01 2022

US DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00864-NJK

Plaintiff,

v.

LOUIS DANIEL RODRIGUEZ and

JOSUE ABRAHAM REYNOSO OCHOA,

Defendants.

Order Granting Government's Motion to Seal Complaint

(Filed Under Seal)

Based on the pending Motion of the Government, and good cause appearing, IT IS
HEREBY ORDERED that the Complaint, the Motion, and this Court's Sealing Order in
the above-captioned matter shall be sealed until further Order of the Court.

DATED this 1st day of November 2022.



HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE

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US DISTRICT COURT
DISTRICT OF NEVADA

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
EDWARD VERONDA
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: (702) 388-6336
Email: Edward.G.Veronda@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOUIS DANIEL RODRIGUEZ and

JOSUE ABRAHAM REYNOSO OCHOA,

Defendants.

Case No. 2:22-mj-00864-NJK

**Government's Motion to Seal
Complaint**

(Filed Under Seal)

COMES NOW the United States of America, by and through Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Motion, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the defendants have not yet been arrested, and the existence of this investigation is neither public nor known to all of the targets of the investigation, and its disclosure may alert the defendants of a pending arrest. In addition, the government has obtained a search warrant to search the premises of the defendants' business, defendants' cell phones, and their

1 persons, as well as the person of another employee who has not been charged. The
2 government currently intends to execute those search warrants on November 2, 2022.

3 Accordingly, there is reason to believe that the disclosure of the existence of the
4 Complaint, as well as the information contained within the Complaint, will jeopardize the
5 investigation, including by giving the defendants an opportunity to flee from prosecution or
6 destroy or tamper with evidence the government intends to search for and seize.

7 DATED this 31st day of October, 2022.

8 Respectfully submitted,

9 JASON M. FRIERSON
United States Attorney

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11 EDWARD G. VERONDA
12 Assistant United States Attorney
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